DIAMOND MCCARTHY LLP

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hapter 11
ase No. 18-23538 (RDD)
Jointly Administered)
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NOTICE OF WITHDRAWAL

PLEASE TAKE NOTICE that on June 24, 2019, Team Worldwide Corporation ("Team

Worldwide"), a creditor of Sears Holdings Corporation and Sears, Roebuck and Co., filed the

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718): A&E Factory Service, LLC (6695): A&E Home Delivery, LLC (0205): A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Motion of Team Worldwide to Modify Automatic Stay Pursuant to 11 U.S.C. §362 (ECF Doc. No. 4344) (the "Stay Relief Motion");

PLEASE TAKE FURTHER NOTICE that the Stay Relief Motion was scheduled to be heard July 11, 2019 pursuant to a *Notice of Hearing* (ECF Doc. No. 4345), and was adjourned to October 23, 2019 by *Notice of Adjournment* (ECF Doc. No. 4699);

PLEASE TAKE FURTHER NOTICE that on October 15, 2019, the Court entered the Order (I) Confirming Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and its Affiliated Debtors and (II) Granting Related Relief (ECF Doc. No. 5370) (the "Confirmation Order"); the Confirmation Order resolves the Stay Relief Motion;

PLEASE TAKE FURTHER NOTICE that Team Worldwide hereby withdraws the Stay Relief Motion, without prejudice.²

Dated: October 16, 2019 New York, New York

DIAMOND McCARTHY LLP

By: s/Charles M. Rubio
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As of the date hereof, the Confirmation Order is not a final order. If the Confirmation does not become a final order, then Team Worldwide reserves its rights to continue to request the relief requested in the Stay Relief Motion.